

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DELSIE E. BROOKENS,)	
)	
PLAINTIFF,)	
)	C.A. No. 07-387(JJF)
v.)	
)	
GENERAL MOTORS CORPORATION, a Delaware)	
Corporation, GENERAL MOTORS CORPORATION,)	
Plan Administrator, and GM HOURLY-RATE)	
EMPLOYEES PENSION PLAN, an employee pension)	
benefit plan,)	
DEFENDANTS.)	

**MOTION TO REQUEST EXTENTION OF TIME FOR
PLAINTIFF TO FILE MOTION FOR SUMMARY JUDGMENT**

COMES NOW, Plaintiff Delsie E. Brookens, through counsel, and Moves this Court for an Extension of Time in which Plaintiff is to file Motion for Summary Judgment in the above action. In support of this Request, Plaintiff states that her Counsel has been unable to contact his client as to needs of her information in support of said motion, and, in addition, has had further time constraints due to other court requirements, thereby restricting his availability to formulate an adequate analysis of the Affirmative Defenses of Defendants' Answer, thereby necessitating this Motion. Counsel had discussed same and previously agreed as to Plaintiff submitting an extension of time request to the Court.

WHEREFORE, Plaintiff therefore requests an extension of time sufficient in which to file a Motion for Summary Judgment.

/s/ JOHN M. STULL
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Dated: May 27, 2008

CERTIFICATE OF SERVICE

I, John M. Stull, counsel for plaintiff herein, do certify that I did on or before May 27, submit the within request to the Court for Extension of Time to file a Motion for Summary Judgment via e-mail, and also forwarded a copy of this Briefing in support thereof as a response to Defendants' Motion for Summary Judgment, and did send a copy of same to counsel for Defendants via U. S. Mail, postage prepaid, with additional copies to the Court, and to Counsel at Eckert Seamans Cherin & Mellot, LLC, 300 Delaware Avenue, Ste 1210, Wilmington, DE 19801, via e-mail to Margaret F. England, mengland@eckertseamons.com.

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